

DECLARATION OF MATTHEW REIMANN

I, Matthew Reimann, declare as follows:

1. I am over 21 years of age, of sound mind, and competent to make this Declaration. I have personal knowledge of the matters contained herein and they are all true and correct. If called to testify I could and would completely testify as follows:

2. I reside in Saxtons River, Vermont, was baptized as one of Jehovah's Witnesses in 1968, and have served as an elder in the Bellows Falls Congregation since 1986.

3. As an elder, I am responsible for the pastoral care and spiritual instruction of congregation members. I provide spiritual counsel and advice to congregation members concerning private, confidential personal and spiritual matters. In accord with the Holy Scriptures, I am authorized to hear confessions and other private, confidential communications and to provide spiritual guidance and counsel by virtue. And in accord with the religious beliefs and practices of Jehovah's Witnesses, I am expected to maintain the confidentiality of confessions and other private spiritual communications.

4. I regularly communicate with other congregation elders and occasionally communicate with elders in other congregations and with Service Department elders on matters of spiritual counsel and application of the doctrines and procedures of Jehovah's Witnesses to issues concerning the congregation and its members. All such spiritual communications done in accord with the principles of Proverbs 11:14, and are kept confidential in accord with the tenets and teachings of Jehovah's Witnesses.

5. I have personal knowledge of the documents at issue involving communications between the United States Branch Service Department and the Bellows Falls Congregation, as well as the communications between elders of the Bellows Falls Congregation and the Claremont Congregation, New Hampshire. Each of those documents and communications contains confidential spiritual information sent for the purpose of seeking or giving spiritual advice and/or guidance. All of them were sent with the expectation that their content would remain private and confidential in accord with the religious beliefs and practices of Jehovah's Witnesses.

6. I also have personal knowledge of the handwritten notes of various Bellows Falls elders at issue. These notes were taken during meetings in which private, penitential and confessional conversations were held between Keith Lewis and Bellows Falls elders. These notes contain sensitive, private, potentially embarrassing information regarding not only Keith Lewis, but other third parties.


7. I am familiar with when Norton true served as a ministerial servant in the Bellows Falls Congregation. He was appointed as a ministerial servant in 1976, and served as such until March of 1986. He did not serve again as ministerial servant until many years later.

8. I am informed that Annessa Lewis claims that she was abused once during the summer of 1991 or 1992. Norton True was not serving in any appointed capacity in any congregation of Jehovah's Witnesses during those years.

9. I am familiar with the claim by R. B., Norton True's step-grand-daughter, that Norton True touched her inappropriately. R.B. retracted her claim against Norton True shortly after she made it. To my knowledge and belief, no criminal prosecution was ever instituted against Norton True based upon the R. B. claim.

I declare under penalty of perjury of the laws of the State of Vermont that the foregoing is true and correct.

Executed on October, 14, 2015 at Bellows Falls, Vermont.


Matthew Reimann, Declarant

Subscribed and sworn to before me this 14 day of October, 2015.


Notary Public, State of Vermont

Commission expires: 2-10-2019

BARBARA JOY
Notary Public in the State of Vermont
WINDHAM COUNTY
Commission Expires Feb. 10, _____